

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
TRAVIS JASON NAVARRO,
Defendant.

NO. CR21-210 RSM

DISCOVERY PROTECTIVE ORDER

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Travis Jason Navarro, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following are deemed Protected Material: (1) recordings of interviews by law enforcement and forensic interviews of Jane Doe 1, as well as other minor friends of Jane Doe 1, and Defendant; and (2) any medical records of Jane Doe not yet in the possession of defense counsel. The United States will make available copies of the Protected Material, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Material is limited to the attorneys of record, and

1 investigators, paralegals, law clerks, experts, and assistants for the attorneys of record
2 (hereinafter collectively referred to as members of the defense team).

3 2. Scope of Review of Protected Material

4 Defense attorneys of record and members of the defense team may display and
5 review the Protected Material with the Defendant. The attorneys of record and members
6 of the defense team acknowledge that providing copies of the Protected Material to the
7 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of
8 Protected Material to the Defendant and other persons. Notwithstanding the terms of this
9 Order, defense counsel may provide electronic copies of any Protected Material to the
10 Education Department in the Federal Detention Center at SeaTac, Washington, along
11 with a completed copy of the FDC's Electronic Discovery and Legal Material
12 Authorization Form. Defendant will not be permitted to have a copy of this material in
13 his cell, but may review it at the FDC Education Department pursuant to BOP and FDC
14 SeaTac's policies and procedures.

15 3. Consent to Terms of Protective Order

16 The attorney of record for the Defendant is required, prior to disseminating any
17 copies of the Protected Material to permitted recipients, such as other members of the
18 defense teams, to provide a copy of this Protective Order to those permitted recipients,
19 and to obtain the written consent by those recipients of the terms and conditions of this
20 Protective Order. Such written consent shall not, however, be required with respect to
21 members of the defense teams who are employed by the same office as the attorney of
22 record; in such case, it shall be sufficient for the attorney of record to provide a copy of
23 this Protective Order to such other members of the defense teams and to remind them of
24 their obligations under the Order. The written consent need not be disclosed or produced
25 to the United States unless requested by the United States Attorney's Office for the
26 Western District of Washington and ordered by the Court.

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1 4. Parties' Reciprocal Discovery Obligations

2 Nothing in this order should be construed as imposing any discovery obligations
3 on the government or the defendant that are different from those imposed by case law and
4 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

5 5. Filing of Protected Material

6 Any Protected Material that is filed with the Court in connection with pre-trial
7 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and
8 shall remain sealed until otherwise ordered by this Court. This does not entitle either
9 party to seal their filings as a matter of course. The parties are required to comply in all
10 respects to the relevant local and federal rules of criminal procedure pertaining to the
11 sealing of court documents.

12 6. Nontermination

13 The provisions of this Order shall not terminate at the conclusion of this
14 prosecution. The provisions of this Order shall terminate only by court order.

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7. Violation of Protective Order

The defendant is on notice that should he violate the terms of this protection order, the United States reserves the right to seek appropriate relief from the Court.

DATED this 3rd day of January 2022.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Rebecca S. Cohen

REBECCA S. COHEN
Assistant United States Attorney

/s/ Cecelia Gregson

CECELIA GREGSON
Assistant United States Attorney

/s/Mohammam Ali Hamoudi

MOHAMMAD ALI HAMOUDI
Attorney for Defendant